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January 28, 2022

**Via PACER**

Honorable. J. Paul Oetken  
United States District Court  
For the Southern District of New York  
40 Foley Square  
Room 2101  
New York, NY 10007  
(212) 805 - 0266

**Re: Zhongshan Tandem Plastic Products Co., Ltd. v. Straightline Capital, LLC (et al)**  
**Case No.: 1:21-cv-02321-JPO – *Request for Clarification***

Honorable Sir:

We are counsel to plaintiff in the above-referenced matter. We write this letter to request a clarification concerning your most recent order of January 21, 2022 in which you imposed a stay of the action based upon a stipulation between plaintiff and defendants CKR Law, LLP (“CKR”), and Jeffrey A. Rinde (“Rinde”) submitting the matter to arbitration pursuant to stipulation. *See* ECF #41.

Rinde and CKR are not the only defendants in the case. On August 20, 2021, Plaintiff filed a motion for default judgment, and supporting materials, against the other defendants in this case, who have not appeared, Straightline Capital LLC (“Straightline”), and David Ault (“Ault”). *See* ECF ## 25-27. That motion has been pending *sub judice* before you since that date.

By this letter, Plaintiff seeks to clarify and confirm that its motion for default against Straightline and Ault remains under consideration, and will be determined regardless of the stay of the action against CKR and Rinde pending arbitration.

If Your Honor has any questions, please have a member of your staff contact me. Thank you for your time and consideration.

Respectfully submitted,

/s/ Anthony C. Acampora

Anthony C. Acampora

cc: Counsel for all parties (via PACER)